

1 Robert J. Cassity
2 Nevada Bar No. 9779
3 David J. Freeman
4 Nevada Bar No. 10045
5 HOLLAND & HART LLP
6 9555 Hillwood Drive, 2nd Floor
7 Las Vegas, NV 89134
8 Phone: (702) 669-4600
9 Fax: (702) 669-4650
10 Email: bcassity@hollandhart.com
11 dfreeman@hollandhart.com

7 Thomas Sporkin (*Admitted Pro Hac Vice*)
8 Timothy J. Coley (*Admitted Pro Hac Vice*)
9 BUCKLEY SANDLER, LLP
10 1250 24th Street NW, Suite 700
11 Washington DC 20037
12 Tel: (202) 349-8000
13 Fax: (202) 349-8080
14 Email: tsporkin@buckleysandler.com
15 tcoley@buckleysandler.com

12 *Attorneys for Defendants Barry K. Epling,*
13 *Ferris Holding, Inc., and Hobbes Equities Inc.*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 SECURITIES AND EXCHANGE
17 COMMISSION

18 v.
19 Plaintiff,

20 HEMP, INC. a Colorado Corporation; BRUCE
21 J. PERLOWIN, an individual; BARRY K.
22 EPLING, an individual; JED M. PERLOWIN,
23 an individual; FERRIS HOLDING, INC., a
24 private Nevada Corporation; HOBBES
EQUITIES INC., a private Nevada Corporation;
DIVERSIFIED INVESTMENTS LLC, a private
Nevada Limited Liability Company; and
QUANTUM ECONOMIC PROTOCOLS LLC,
a private Nevada Limited Liability Company,

25 Defendants.

26 Amy J. Oliver (Utah #8785)
27 admitted pro hac vice
28 OliverA@sec.gov
Daniel J. Wadley (Utah #10358)
admitted pro hac vice
WadleyD@sec.gov
James J. Thibodeau (Utah #15473)
admitted pro hac vice
ThibodeauJ@sec.gov
Attorneys for Plaintiff
Securities and Exchange
Commission
Salt Lake Regional Office
351 South West Temple
Suite 6.100
Salt Lake City, UT 84101-1950
Tel.: (801) 524-5796
Fax: (801) 524-3558

Attorneys for Plaintiff Securities
and Exchange Commission

CASE NO.: 2:16-cv-01413-RFB-GWF

**JOINT STIPULATION AND ORDER TO
EXTEND RESPONSE AND REPLY
DEADLINES FOR:**

**(1) PLAINTIFF'S MOTION FOR
IMPOSITION OF SANCTIONS
AGAINST DEFENDANTS BARRY K.
EPLING, FOR FABRICATION OF
EVIDENCE AND AGAINST
DEFENDANTS BARRY K. EPLING AND
BRUCE J. PERLOWIN FOR FALSE
TESTIMONY [ECF NO. 92] [SECOND
REQUEST] AND**

**(2) PLAINTIFF'S MOTION FOR
IMPOSITION OF SANCTIONS
AGAINST DEFENDANTS FERRIS
HOLDING, INC., BARRY K. EPLING,
AND HOBBES EQUITIES, INC. FOR
FABRICATION OF EVIDENCE [ECF
NO. 97] [FIRST REQUEST]**

1 Pursuant to LR IA 6-1, Plaintiff and Certain Defendants¹ herein, by and through their
2 attorneys of record, stipulate as follows:

3 1. On October 26, 2017, Plaintiff filed a *Motion for Imposition of Sanctions Against*
4 *Defendants Barry K. Epling, For Fabrication of Evidence and Against Defendants Barry K.*
5 *Epling and Bruce J. Perlowin for False Testimony* (ECF No. 92) (“First Sanctions Motion”).

6 2. On October 31, 2017, this Court issued an order granting the parties *Joint*
7 *Stipulation and Order to Extend Response and Reply Deadlines for Plaintiff’s Motion in Limine*
8 *and Plaintiff’s Motion for Imposition of Sanctions* (the “Order”).

9 3. The Order extended the response deadline to the First Sanctions Motion until
10 November 20, 2017 and the reply deadline until December 20, 2017.

11 4. On November 2, 2017, Plaintiff filed a *Motion for Imposition of Sanctions*
12 *Against Defendants Ferris Holdings, Inc., Barry K. Epling, and Hobbes Equities, Inc. for*
13 *Fabrication of Evidence* (ECF No. 97) (“Second Sanctions Motion”).

14 5. Under the Rules, the current deadline for Certain Defendants to respond to the
15 Second Sanctions Motion is November 16, 2017, and the current deadline for Plaintiff to file a
16 reply is November 27, 2017.

17 6. The parties hereby seek an extension of the response deadlines for the First and
18 Second Sanctions Motions (the “Motions”) until **December 4, 2017**, and until **January 3, 2018**
19 for the reply deadlines (30 days thereafter).

20 7. This is the parties’ second request for an extension of the response and reply
21 deadlines with respect to the First Sanctions Motion.

22 8. This is the parties first request for an extension of the response and reply
23 deadlines with respect to the Second Sanctions Motion.

24 9. The reasons warranting additional time for the response and reply deadlines are
25 as follows:

26
27 ¹ “Certain Defendants” are those against whom Plaintiff’s Motions for Imposition of Sanctions
28 [ECF Nos. 92 and 97] are directed: Barry K. Epling, Bruce J. Perlowin, Ferris Holding, Inc., and
Hobbes Equities Inc.

a. Certain Defendants recently retained special counsel, Thomas E. Littler, Esq. (“Mr. Littler”), in the above-referenced case to respond to the recently filed Motions. Mr. Littler is licensed in Arizona, not Nevada, and is currently preparing his Pro Hac Vice application. He applied to the Arizona Supreme Court for the required certificate of good standing and received it on Tuesday. Additional time will be required to get the application filed and obtain permission to appear before this Court in the District of Nevada so that Mr. Littler may make his appearance and defend the Motions.

b. Furthermore, Mr. Littler has no previous relationship with Certain Defendants or this case. Although Mr. Littler has reviewed the two factually intensive Motions, he will need additional time to familiarize himself with the facts, including the hundreds of pages of exhibits, complete his review of the Motions and finish his investigation.

c. Counsel for the SEC has no objection to Certain Defendants' request to extend the deadlines to respond to the Motions. Counsel for the SEC also requests additional time to file the reply memorandums in support of the Motions due to the additional time requested by Certain Defendants and the other motion deadlines in this case.

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1 10. Counsel for the parties have conferred regarding these requested extensions, as
2 well as the reasons supporting the requested extensions, and they agree that the requested
3 extensions are an appropriate and efficient means of resolving the parties' scheduling and
4 briefing concerns.

5 **IT IS SO STIPULATED**

6 DATED November 14, 2017.

7 /s/ Robert J. Cassity, _____
8 Robert J. Cassity, Esq.
9 HOLLAND & HART LLP
10 9555 Hillwood Drive, 2nd Floor
11 Las Vegas, Nevada 89134

12 Thomas A. Sporkin (*Pro Hac Vice*)
13 Timothy J. Coley (*Pro Hac Vice*)
14 BUCKLEY SANDLER, LLP
15 1250 24th Street NW, Suite 700
16 Washington DC 20037

17 *Attorneys for Defendants Barry K. Epling,
18 Ferris Holding, Inc., and Hobbes Equities Inc.*

19 /s/ Amy J. Oliver _____
20 Amy J. Oliver (Utah #8785)
21 admitted pro hac vice
22 OliverA@sec.gov
23 Daniel J. Wadley (Utah #10358)
24 admitted pro hac vice
25 WadleyD@sec.gov
26 James J. Thibodeau (Utah #15473)
27 admitted pro hac vice
28 ThibodeauJ@sec.gov
29 *Attorneys for Plaintiff
30 Securities and Exchange
31 Commission
32 Salt Lake Regional Office
33 351 South West Temple
34 Suite 6.100
35 Salt Lake City, UT 84101-1950*

36 *Attorneys for Plaintiff Securities
37 and Exchange Commission*

38 **ORDER**

39 IT IS SO ORDERED.

40 
41 U.S. DISTRICT/MAGISTRATE JUDGE

42 DATED: November 17, 2017

CERTIFICATE OF SERVICE

2 I hereby certify that on the 14th day of November, 2017, a true and correct copy of the
3 foregoing **JOINT STIPULATION AND ORDER TO EXTEND RESPONSE AND REPLY**
4 **DEADLINES FOR (1) PLAINTIFF'S MOTION FOR IMPOSITION OF SANCTIONS**
5 **AGAINST DEFENDANTS BARRY K. EPLING, FOR FABRICATION OF EVIDENCE**
6 **AND AGAINST DEFENDANTS BARRY K. EPLING AND BRUCE J. PERLOWIN FOR**
7 **FALSE TESTIMONY [ECF NO. 92] [SECOND REQUEST] AND (2) PLAINTIFF'S**
8 **MOTION FOR IMPOSITION OF SANCTIONS AGAINST DEFENDANTS FERRIS**
9 **HOLDING, INC., BARRY K. EPLING, AND HOBES EQUITIES, INC. FOR**
10 **FABRICATION OF EVIDENCE [ECF NO. 97] [FIRST REQUEST]** was served on counsel
11 through the Court's electronic service system as follows:

Electronic Service:

Amy J. Oliver, Esq.
James J. Thibodeau, Esq.
Daniel Wadley, Esq.
U.S. Securities and Exchange Commission
351 S. West Temple Suite 6.100
Salt Lake City, UT 84101
olivera@sec.gov
thibodeauj@sec.gov
wadleyd@sec.gov

Attorneys for Plaintiff: SEC

Brent R. Baker, Esq.
Jonathan Dale Bletzacker, Esq.
Clyde Snow & Sessions, P.C.
201 S. Main Street #1300
Salt Lake City, UT 84111
brb@clydesnow.com
ldb@clydesnow.com

Jacob L. Fonnesbeck, Esq.
Smith Correll, LLP
50 W. Broadway #1010
Salt Lake City, UT 84101
jfonnesbeck@smithcorrell.com

Attorney for Defendants:
Diversified Investments LLC, Quantum
Economic Protocols LLC, and Jed. M.
Perlowin

/s/ Valerie Larsen
An Employee of Holland & Hart LLP